

EMERGENCY PREPAREDNESS
CALIFORNIA STATE POLYTECHNIC UNIVERSITY,
POMONA

Audit Report 09-44
August 13, 2009

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ABBREVIATIONS

CalEMA	California Emergency Management Agency
CSU	California State University
DHS	(Federal) Department of Homeland Security
EMP	Emergency Management Plan
EO	Executive Order
EOC	Emergency Operations Center
EP	Emergency Preparedness
FEMA	Federal Emergency Management Agency
ICS	Incident Command System
NIMS	National Incident Management System
OES	(California) Office of Emergency Services
ORM	Office of Risk Management
SEMS	Standardized Emergency Management System
UPD	University Police Department

EXECUTIVE SUMMARY

As a result of a systemwide risk assessment conducted by the Office of the University Auditor during the last quarter of 2008, the Board of Trustees, at its January 2009 meeting, directed that *Emergency Preparedness* be reviewed. Similar audits of Disaster and Emergency Preparedness were conducted in 2006.

We visited the California State Polytechnic University, Pomona campus from March 2, 2009, through April 3, 2009, and audited the procedures in effect at that time.

Our study and evaluation did not reveal any significant internal control problems or weaknesses that would be considered pervasive in their effects on emergency preparedness controls. However, we did identify other reportable weaknesses that are described in the executive summary and body of this report. In our opinion, the operational and administrative controls for emergency preparedness in effect as of April 3, 2009, taken as a whole, were sufficient to meet the objectives stated below.

As a result of changing conditions and the degree of compliance with procedures, the effectiveness of controls changes over time. Specific limitations that may hinder the effectiveness of an otherwise adequate system of controls include, but are not limited to, resource constraints, faulty judgments, unintentional errors, circumvention by collusion, and management overrides. Establishing controls that would prevent all these limitations would not be cost-effective; moreover, an audit may not always detect these limitations.

The following summary provides management with an overview of conditions requiring attention. Areas of review not mentioned in this section were found to be satisfactory. Numbers in brackets [] refer to page numbers in the report.

PROGRAM ADMINISTRATION [7]

Annual budget requests for emergency preparedness and planning activities were not prepared and submitted to the vice president/chief financial officer by the emergency planning team committee.

EMERGENCY MANAGEMENT PROGRAM [8]

The campus emergency management plan had not been reviewed nor updated on an annual basis, and the delegation of authority to the vice president of student affairs for the emergency management program was not current.

COMMUNICATIONS AND TRAINING [9]

The EMP was not easily located on the campus website and did not include complete and updated information, and campus maps published on the campus website did not include the alternate emergency operations center. Emergency management team members were not issued systemwide identification cards as part of their emergency credentials. Further, emergency preparedness overview training for new hires was not always completed. This is a repeat finding from the prior Disaster and Emergency Preparedness audit performed in 2006.

TESTING AND DRILLS [12]

The inclusion of special populations in evacuation exercises was not formally documented. In addition, emergency generator records used by the facilities electrical staff were inaccurate and outdated.

INTRODUCTION

BACKGROUND

Emergency preparedness is the multihazard approach to preparing for emergencies and disasters of a wide variety. The National Safety Council (www.nsc.org) has provided guidance showing that disasters and emergencies are inevitable. These events include personal injuries, fires, explosions, chemical spills, toxic gas releases, natural disasters such as earthquakes, tornadoes, floods, and epidemics, and man-made disasters such as terrorist activities and riots. Anticipating emergencies and planning for an appropriate response can greatly lessen the extent of injuries and health concerns. Emergency preparedness can also limit damage to property, equipment, and materials. Experience tells us that when disasters and emergencies occur, the emergency response based on emergency-preparedness and crisis-training programs will significantly affect the extent of damages and injuries sustained. The president of each of the 23 California State University (CSU) campuses has been delegated the responsibility for the implementation and maintenance of an emergency management program.

In many instances, emergency preparedness is the foresight to plan for disasters such as earthquakes, floods, fires, and man-made disasters (the most common emergency situations in California). There is no single definition of what constitutes a disaster. A disaster can develop quickly, hitting full-force with little or no warning. Other times, a disaster can loom on the horizon for weeks until it becomes large enough to be a threat. Government Code §8680.3 defines disaster to mean:

A fire, flood, storm, tidal wave, earthquake, terrorism, epidemic, or other similar public calamity that the governor determines presents a threat to public safety.

In California Code of Regulations, Title 19, §2402, *Standardized Emergency Management System* (SEMS) Regulations, emergency is defined to mean:

A condition of disaster or of extreme peril to the safety of persons and property caused by such conditions as air pollution, fire, flood, hazardous material incident, storm, epidemic, riot, drought, sudden and severe energy shortage, plant or animal infestations or disease, the governor's warning of an earthquake or volcanic prediction, or an earthquake or other conditions, other than conditions resulting from a labor controversy.

The Federal Emergency Management Agency (FEMA) describes emergency preparedness as multi-hazard mitigation planning and states that mitigation plans form the foundation for a community's long-term strategy to reduce disaster losses and break the cycle of disaster damage, reconstruction, and repeated damage. The planning process is as important as the plan itself. It creates a framework for risk-based decision making to reduce damages to lives, property, and the economy from future disasters. Hazard mitigation is sustained action taken to reduce or eliminate long-term risk to people and their property from hazards. State, Indian Tribal, and local governments are required to develop a hazard mitigation plan as a condition for receiving certain types of non-emergency disaster assistance and FEMA funds available for mitigation plan development and mitigation projects.

The California State Office of Emergency Services (OES), in coordination with all interested state agencies with designated response roles in the state emergency plan and interested local emergency management agencies, established by regulation a SEMS for use by all emergency response agencies.

SEMS is the system required by Government Code §8607(a) for managing response to multiagency and multijurisdictional emergencies in California. As a result of the 1991 East Bay Hills fire in Oakland, Senate Bill 1841 was passed and made effective January 1, 1993. The intent of this law is to improve the coordination of state and local emergency response in California, and it implemented SEMS. SEMS Regulations took effect in September 1994. SEMS consists of five organizational levels, which are activated as necessary: field response, local government, operational area, regional, and state. By standardizing key elements of the emergency management system, SEMS is intended to facilitate the flow of information within and between levels of the system and facilitate coordination among all responding agencies. SEMS incorporates the use of five essential Incident Command System (ICS) functions: command (management), operations, planning/intelligence, logistics, and finance/administration. As a result of OES and SEMS Regulations, all CSU campuses are required to formally adopt and implement SEMS.

In 2004, the federal Department of Homeland Security (DHS) developed the National Incident Management System (NIMS) under Presidential Directive HSPD-5, *Management of Domestic Incidents*. NIMS was designed to improve the national readiness to respond to not only terrorist events but all types of disasters. NIMS is similar to California's SEMS. This similarity is most evident in the NIMS version of the ICS and adoption of the concept of mutual aid. The final version of NIMS was released on March 1, 2004. To fully implement NIMS, DHS created NIMS integration procedures and decided to phase in NIMS over time. As a result of these efforts, all federal departments and agencies, as well as state, local, and tribal governments, are required to be fully compliant with NIMS in order to apply for federal emergency preparedness assistance.

In late 2008, the California Emergency Management Agency (CalEMA) was formed to combine both OES and the California Department of Homeland Security. The goal of the CalEMA is to identify methods and guidance to assist all levels of emergency management in California to meet the requirements of NIMS while maintaining compliance with SEMS.

Executive Order 1013, *California State University Emergency Management Program*, dated August 7, 2007, requires the implementation and maintenance of an emergency management system on each campus that will be activated when an event has the potential for reaching proportions beyond the capacity of routine operations. Each campus plan must be compliant with SEMS, NIMS, and the SEMS/NIMS ICS. In 2006, to be flexible in responding to health-related emergencies, the CSU implemented pandemic influenza preparedness and response plans across all campuses, and those plans were reviewed in the 2006 Disaster and Emergency Preparedness audits. In 2008, as a response to nationwide concerns for campus security, the CSU implemented active shooter drills and training systemwide, and those activities continue throughout the year as detailed procedures and standards evolve.

PURPOSE

Our overall audit objective was to ascertain the effectiveness of existing policies and procedures related to the administration of *Emergency Preparedness* (EP) activity and to determine the adequacy of controls that ensure compliance with relevant governmental regulations, Trustee policy, Office of the Chancellor directives, and campus procedures.

Within the audit objective, specific goals included determining whether:

- ▶ Administration of EP incorporates a defined mission, stated goals and objectives, and clear lines of organizational authority and responsibility, and is adequately funded.
- ▶ Initiatives and investments are underway to improve EP and to maximize EP resources; risks specific to the campus have been identified; and policies and procedures are current, comprehensive, and sufficient to support campus EP.
- ▶ An adequate emergency operations center (EOC) exists; sufficient equipment, supplies, and other critical resources are properly provisioned; and the campus is fully prepared for emergencies.
- ▶ The emergency plan is compliant with SEMS and NIMS and clearly identifies who has authority and responsibility for emergencies and incidents; the emergency organization is sufficient to ensure that campus command/incident command techniques provide command and control when emergency incidents occur; and effective building marshal and volunteer programs have been established.
- ▶ Emergency resources are available; emergency plans have been updated appropriately; and any related/subordinate plans are integrated with the campus emergency plan.
- ▶ Incidents are mitigated timely; lessons learned are evaluated; appropriate after-action reports are prepared; and the campus has sufficient plans for mitigation of any facilities deficiencies.
- ▶ The emergency plan has been adequately communicated to the campus community; the campus is compliant with required communications with the chancellor's office and with emergency management agencies; and grants for emergency communications and operations are adequately managed and tracked.
- ▶ Sufficient training has been provided to new employees, emergency management staff, and building marshals; the finance function has been integrated into the emergency response activities; and specialized training has been provided in the areas of SEMS, NIMS, and incident command systems for the student health center, building marshals, and for disaster service worker program volunteers.
- ▶ The campus has plans for, and adequately administers, testing and drills for emergency incidents, emergency communications, evacuations, active shooter situations, and mutual aid; and written incident action plans follow SEMS/NIMS guidelines.
- ▶ Generators, communications devices, and other equipment and supplies are functional and tested frequently; and the related responsibility is appropriately assigned.

SCOPE AND METHODOLOGY

The proposed scope of the audit as presented in Attachment B, Audit Agenda Item 2 of the January 27 and 28, 2009, meeting of the Committee on Audit stated that emergency preparedness includes review of compliance with the National Incident Management System, Trustee policy and systemwide directives; contingency and disaster recovery planning; backup communications; building safety and emergency egress including provisions for individuals with disabilities; the extent of plan training and testing; and relationships with state and federal emergency management agencies.

Our study and evaluation were conducted in accordance with the *International Standards for the Professional Practice of Internal Auditing* issued by the Institute of Internal Auditors, and included the audit tests we considered necessary in determining that operational and administrative controls are in place and operative. This review emphasized, but was not limited to, compliance with state and federal laws, Board of Trustee policies, and Office of the Chancellor and campus policies, letters, and directives. The audit review focused on procedures in effect from January 1, 2007, through April 3, 2009. In instances wherein it was necessary to review annualized data, calendar years 2007 and 2008 were the periods reviewed.

We focused primarily upon the internal administrative, compliance, and operational controls over the campus-wide emergency operations plan and related management activities. Specifically, we reviewed and tested:

- ▶ The emergency management organization.
- ▶ Emergency management plan and event-specific annexes.
- ▶ Emergency management plan guidelines, policies, procedures, and recordkeeping.
- ▶ The building marshal program, emergency action plans, and the campus emergency hotline.
- ▶ The EOC, emergency equipment, and related emergency supplies.
- ▶ Coordination with other agencies, including mutual aid and assistance.
- ▶ Funding and budgetary controls for emergency management activities.
- ▶ Communication of the emergency management plan.
- ▶ Training for emergency management activities.
- ▶ Evacuation drills and emergency plan testing.

OBSERVATIONS, RECOMMENDATIONS, AND CAMPUS RESPONSES

PROGRAM ADMINISTRATION

Annual budget requests for emergency preparedness and planning activities were not prepared and submitted to the vice president/chief financial officer by the emergency planning team committee.

Standardized Emergency Management System (SEMS) Regulations, Part I, §4, *Resources Management*, dated December 23, 1994, states, in part, that at all SEMS levels, there will be some functional activity related to managing resources in terms of directing and controlling, coordination, and resource inventorying.

The U.S. Department of Education *Action Guide for Emergency Management at Institutions of Higher Education*, dated January 2009, states that some items will require the identification of funding sources and inclusion in budgets for the organization. For all items, points of responsibility and a specific schedule for implementation should be identified. The Action Guide further states that institutions may want to establish a separate budget for emergency management as a means of emphasizing its support of emergency management objectives and facilitating the achievement of those objectives. A separate budget is one way to clarify what resources are needed for the emergency management program and sustain a level of commitment to the program over time.

The associate vice president/associate chief financial officer stated that emergency preparedness budgets had not been prepared because the responsibility for this task had not been appropriately assigned.

Failure to prepare annual budget requests for emergency preparedness and planning activities increases the risk that emergency management activities will not be adequately funded.

Recommendation 1

We recommend that the campus require the emergency planning team committee to prepare and submit annual budget requests for emergency preparedness and planning activities to the vice president/chief financial officer.

Campus Response

We concur. The campus will require the emergency planning team committee to prepare and submit annual budget requests for emergency preparedness and planning activities to the vice president/chief financial officer.

Timeline: November 1, 2009

EMERGENCY MANAGEMENT PROGRAM

The campus emergency management plan (EMP) had not been reviewed or updated on an annual basis, and the delegation of authority to the vice president of student affairs for the emergency management program was not current.

We noted that:

- ▶ The EMP showed an effective date of August 2006, based on the letter of promulgation signed by the president. There was no documentation of further review and/or update to the EMP since that date, evidencing that the EMP is current, accurate, and complete.
- ▶ The delegation of authority to the vice president of student affairs for the emergency management program was not current and referenced implementation of California State University (CSU) Executive Order (EO) 921, which was superseded by EO 1013 in 2007.

EO 1013, *California State University Emergency Management Program*, dated August 7, 2007, requires that each campus develop a campus emergency plan. On an annual basis or more frequently as needed, the plan should be reviewed, updated, and distributed to the emergency management team members and others as identified by the campus.

The chief of police and director of public safety stated that updates to the EMP are ongoing and the current major revision had not yet been finalized due to the complexity of formatting the EMP to parallel plans of surrounding cities. He further stated that because EO 1013 was only recently issued, a revision of the delegation of authority had not yet been scheduled.

Failure to maintain an updated EMP and related delegation of authority increases the risk that emergency responders will not be fully aware of important revisions to the plan, consequently increasing the risk of inadequate response to emergencies.

Recommendation 2

We recommend that the campus review and update the EMP and the delegation of authority to the vice president of student affairs on at least an annual basis to ensure that the information is current, accurate, and complete.

Campus Response

We concur. Consistent with the language in EO 1013, we will revise and re-issue the delegation when there is a change in personnel. We will review the EMP on an annual basis and revise it as necessary. We will include a Record of Changes form at the beginning of the plan to ensure that there is a record of review, revisions, and distribution.

Timeline: December 31, 2009

COMMUNICATIONS AND TRAINING

EMERGENCY MANAGEMENT PLAN COMMUNICATIONS

The EMP was not easily located on the campus website and did not include complete and updated information, and campus maps published on the campus website did not include the alternate emergency operations center (EOC).

We noted that:

- ▶ There was no direct link to the EMP on the campus home page, making it difficult to locate especially for those not familiar with the campus website.
- ▶ Non-proprietary sections of the most current version of the EMP were not yet available on the campus website.
- ▶ Campus maps published on the campus website and in the EMP did not include the new university police department (UPD) building, which is an alternate EOC and key to emergency response.

EO 1013, *California State University Emergency Management Program*, dated August 7, 2007, states that campuses should continually communicate the emergency management plan to the campus community in a variety of methods through public education (e.g., web posting of the plan, except for active-shooter/terrorist responses plans) or other mechanisms for dissemination of hazard planning materials.

The chief of police and director of public safety stated that provision for the EMP link on the campus home page had not yet been resolved with the campus web development team due to time constraints, and the non-proprietary sections were not yet available on the campus website because a major plan revision was still in process. The director, instructional and information technology, web development stated that the UPD map location was not included in the campus maps section due to time constraints caused by multiple construction projects across the campus.

Failure to provide a direct link to complete and up-to-date EMP information and campus maps increases the risk of inadequate response to emergencies.

Recommendation 3

We recommend that the campus:

- a. Create a direct link to the EMP on the campus home page.
- b. Include non-proprietary sections of the current version of the EMP on the campus website.
- c. Update campus maps published on the campus website, and in the EMP, to include the new UPD building.

Campus Response

We concur.

- a. A link will be created to the EMP from Cal Poly's home page.
- b. The non-propriety sections of the current version of the EMP will be included on the campus website.
- c. Campus maps will be updated and published on the campus website and in the EMP including the new UPD building.

Timeline: December 31, 2009

EMERGENCY CREDENTIALS

Emergency management team members were not issued systemwide identification cards as part of their emergency credentials.

CSU Office of Risk Management (ORM), *Communication on Emergency Identification Cards*, dated September 2007, advised the campuses to utilize an identification card template, provided by the systemwide police coordinator, to standardize campus emergency response personnel identification. The identification cards should include a header, campus name, CSU official seal, employee name, resident's signature, employee picture, campus public safety phone number and card expiration date, and other specific information.

The chief of police and director of public safety stated that campus emergency credentials were in place but the reissuance of the identification card requested by the ORM was delayed due to conflicting priorities, coordination delays with the identification card office on campus, and a pending PeopleSoft software update.

Failure to provide emergency management team members with systemwide emergency identification credentials increases the risk that delays may occur when entering campus facilities during significant emergency incidents.

Recommendation 4

We recommend that the campus provide emergency management team members with systemwide emergency credentials based on the template provided by the ORM.

Campus Response

We concur. We will provide the emergency management team members with systemwide emergency credentials based on the template provided by the ORM.

Timeline: December 31, 2009

NEW HIRE EMERGENCY PREPAREDNESS TRAINING

Emergency preparedness overview training for new hires was not always completed. This is a repeat finding from the prior Disaster and Emergency Preparedness audit performed in 2006.

When we reviewed the emergency awareness and safety training records for active employees hired between January 1, 2007, and February 28, 2008, we found that:

- ▶ Six of 25 staff new hires had not received overview safety and emergency awareness training within the first year of employment.
- ▶ Seventeen of 25 faculty new hires had not received overview safety and emergency awareness training within the first year of employment.
- ▶ There were no written procedures to address emergency preparedness overview training for all newly hired staff and faculty.

EO 1013, *California State University Emergency Management Program*, dated August 7, 2007, states that campuses should train the campus community on the SEMS, NIMS, and ICS compliant campus plan to include, at a minimum, overview training of every employee within one year of employment. The EO further states that training records for all campus training shall be kept for a minimum of seven years.

The associate vice president/associate chief financial officer stated that discrepancies in staff new-hire training were due to scheduling difficulties. The director of the faculty center for professional development stated that faculty training deficiencies were due to scheduling difficulties, mainly with lecturers.

Failure to provide emergency preparedness overview training for new hires increases the risk that emergency response would be inadequate due to incomplete training and preparation.

Recommendation 5

We recommend that the campus:

- a. Ensure that emergency preparedness overview training is provided to all staff and faculty that did not complete the training between January 1, 2007, and February 28, 2008, and all new hires since.
- b. Develop written procedures to address emergency preparedness overview training for all newly hired staff and faculty, including the completion and retention of required training documentation.

Campus Response

We concur.

- a. Emergency preparedness overview training is available online for staff and faculty that did not complete the training between January 1, 2007, and February 28, 2008, and will be provided to all new hires effective immediately. A communication will be sent to those who missed the training with instructions on how to view the training online.
- b. We will develop written procedures to address emergency preparedness overview training for all newly hired staff and faculty, including the completion and retention of required training documentation.

Timeline: December 31, 2009

TESTING AND DRILLS

EVACUATION DRILLS FOR SPECIAL POPULATIONS

The inclusion of special populations in evacuation exercises was not formally documented.

EO 1013, *California State University Emergency Management Program*, dated August 7, 2007, states that campuses should conduct testing of simulated emergency incidents, including the periodic testing of campus building evacuation drills, and they should be conducted at least annually or more frequently as needed.

The U.S. Department of Education *Action Guide for Emergency Management at Institutions of Higher Education*, dated January 2009, states that emergency management plans must be based on a comprehensive design, while also providing for staff, students, faculty, and visitors with special needs. Every aspect of an emergency plan also should incorporate provisions for vulnerable populations, those of which can have a wide range of needs, including language barriers, disabilities, or other special conditions. Thus, any procedures, products, and protocols created to prevent, prepare, respond, and recover from an emergency must accommodate people with various levels of cognitive ability, knowledge, physical capabilities and life experience.

The chief of police and director of public safety stated that although representatives of special populations were often included in evacuations, there had been no formal recordkeeping of such activities maintained on file as evidence.

Failure to include special populations in evacuation exercises increases the risk of litigation and the risk that both emergency responders and special populations would not be sufficiently trained to respond to drills and emergencies.

Recommendation 6

We recommend that the campus document the inclusion of special populations in evacuation exercises.

Campus Response

We concur. We will document the inclusion of special populations in the campus evacuation exercises.

Timeline: September 30, 2009

RECORDKEEPING FOR EMERGENCY BACKUP GENERATORS

Emergency generator records used by the facilities electrical staff were inaccurate and outdated.

We found that the emergency generator list was dated December 18, 2006, and included outdated information. We reviewed 13 of the 21 generators included on the generator list and noted that:

- ▶ The diesel generator for building 16 no longer existed. The generator list had not been updated to include the replacement generator's model, make, and serial number.
- ▶ Diesel generators for buildings 3 and 109, respectively, were not included on the campus generator list.
- ▶ The "run log" at the diesel generator for building 82 was not updated to show that the generator had been tested and run for two hours since the last run log date of August 2008.
- ▶ The generator list did not include the manufacturer name, model number, and/or serial number for 6 of the 13 generators reviewed.
- ▶ The generator list did not agree with the facilities planning and management TMA Systems database, which was found to be much more accurate.

EO 1013, *California State University Emergency Management Program*, dated August 7, 2007, states that campuses should develop a roster of campus resources and contracts for materials and services that may be needed in an emergency situation including equipment, emergency power, communications, food and water, and satellite and other mobile phone numbers, and update at least annually or as needed.

The supervising electrician, facilities management, stated that the campus generator records were outdated due to simple clerical errors; the run log for the generator at building 82 was aged beyond use and needed new run log sheets inserted; and more current information available in the facilities TMA Systems database was not used.

Failure to maintain accurate emergency generator records increases the risk that emergency preparedness and the expectations for emergency power response would not be optimal.

Recommendation 7

We recommend that the campus ensure that emergency generator records be accurately maintained and kept current.

Campus Response

We concur. The campus will ensure that emergency generator records are accurately maintained and current.

Timeline: September 30, 2009

APPENDIX A: PERSONNEL CONTACTED

<u>Name</u>	<u>Title</u>
J. Michael Ortiz	President
Edwin Barnes	Vice President/Chief Financial Officer, Administrative Affairs
Eric Bellman	Manager, System Administration, Facilities Planning and Management
Curtis Clark	Director, Instructional and Information Technology, Web Development
Lisa Dye	Business Continuity Coordinator, Risk Management
Valerie Eberle	Manager, Benefits, Workers' Compensation, and Risk Programs, Risk Management
Carolyn Forrester	Instructional Support Technician, Chemistry Department
Douglas Freer	Vice President, Student Affairs
Matthew French	Supervising Electrician, Facilities Management
Michael Guerin	Chief of Police and Director of Public Safety, University Police
Robert Hansen	Manager, Facilities Planning
Kathy Harper	Secretary, Finance and Administrative Services
Fred Henderson	Services Division Manager, University Police
Donald Johnson	Manager Mechanical Services, Facilities Management
Darwin Labordo	Associate Vice President/Associate Chief Financial Officer, Finance and Administrative Services
Jerry Lerma	Web Graphic Designer, Instructional and Information Technology, Web Development
Uyen Mai	Senior Media Communications Coordinator, Public Affairs
Mary Martinez	Payroll Manager and Leave Coordinator, Human Resources
Debbi McFall	Emergency Services Coordinator, University Police
Ray Morrison	Director, Facilities Planning
Paul Nath	Facilities Worker, Facilities Management
David Patterson	Director, Environmental Health and Safety
Peggy Perry	Director, Faculty Center for Professional Development, Faculty Affairs
Kathleen Prunty	Director, Procurement and Support Services
Lorraine Rodriguez	Buyer, Procurement and Support Services
Catherine Schmitt Whitaker	Director, Disability Resource Center
George Tejadilla	Director of Academic Personnel, Faculty Affairs
Therese Turner	Lead Employment Coordinator, Human Resources
Mark Ulrich	Director, Student Health Services
Tambra Williams	Executive Assistant, Public Affairs
George Wright	Associate Director of Facilities, University Housing Services
Joice Xiong	Director of Internal Audit



Office of the Vice President
for Administrative Affairs

RECEIVED
UNIVERSITY AUDITOR

SEP 3 2009

THE CALIFORNIA STATE
UNIVERSITY

September 1, 2009

Mr. Larry Mandel, University Auditor
Office of the Auditor
The California State University
400 Golden Shore, Suite 210
Long Beach, CA 90802

Dear Mr. Mandel:

Subject: Campus Response to Recommendations of Emergency Preparedness 09-44

Enclosed is California State Polytechnic's campus response to the Emergency Preparedness Audit 09-44. We appreciate the effort you and your staff have made to indicate areas where our procedures or internal controls could be strengthened. We will take the necessary actions to address the report's recommendations.

Please direct questions concerning the response to Darwin Labordo, Associate Vice President of Finance and Administrative Services and Associate Chief Financial Officer at 909-869-2008 or dlabordo@csupomona.edu.

Sincerely,

Edwin A. Barnes, III, Vice President
Administrative Affairs

Cc: J. Michael Ortiz, President
Dr. Douglas R. Freer, Vice President, Student Affairs
Michael Guerin, Chief, University Police
Darwin Labordo, Associate Vice President, Finance & Administrative Services
Joice Xiong, University Auditor

Enclosure

EMERGENCY PREPAREDNESS

CALIFORNIA STATE POLYTECHNIC UNIVERSITY, POMONA

Audit Report 09-44

PROGRAM ADMINISTRATION

Recommendation 1

We recommend that the campus require the emergency planning team committee to prepare and submit annual budget requests for emergency preparedness and planning activities to the vice president/chief financial officer.

Campus Response

We concur. The campus will require the emergency planning team committee to prepare and submit annual budgets for emergency preparedness and planning activities to the vice president/chief financial officer.

Timeline: November 1, 2009

EMERGENCY MANAGEMENT PROGRAM

Recommendation 2

We recommend that the campus review and update the EMP and the delegation of authority to the vice president of student affairs on at least an annual basis to ensure that the information is current, accurate, and complete.

Campus Response

We concur. Consistent with the language in EO 1013 we will revise and re-issue the delegation when there is a change in personnel. We will review the EMP on an annual basis and revise it as necessary. We will include a Record of Changes form at the beginning of the plan to ensure that there is a record of review, revisions, and distribution.

Timeline: December 31, 2009

COMMUNICATIONS AND TRAINING

EMERGENCY MANAGEMENT PLAN COMMUNICATIONS

Recommendation 3

We recommend that the campus:

- a. Create a direct link to the EMP on the campus home page.
- b. Include non-proprietary sections of the current version of the EMP on the campus website.
- c. Update campus maps published on the campus website, and in the EMP, to include the new UPD building.

Campus Response

We concur.

- a. A link will be created to the EMP from Cal Poly's home page.
- b. The non-proprietary sections of the current version of the EMP will be included on the campus website.
- c. Campus maps will be updated and published on the campus website and in the EMP including the new UPD building.

Timeline: December 31, 2009

EMERGENCY CREDENTIALS

Recommendation 4

We recommend that the campus provide emergency management team members with systemwide emergency credentials based on the template provided by the ORM.

Campus Response

We concur. We will provide the emergency management team members with systemwide emergency credentials based on the template provided by the ORM.

Timeline: December 31, 2009

NEW HIRE EMERGENCY PREPAREDNESS TRAINING

Recommendation 5

We recommend that the campus:

- a. Ensure that emergency preparedness overview training is provided to all staff and faculty that did not complete the training between January 1, 2007, and February 28, 2008, and all new hires since.
- b. Develop written procedures to address emergency preparedness overview training for all newly hired staff and faculty, including the completion and retention of required training documentation.

Campus Response

We concur.

- a. Emergency preparedness overview training is available online for staff and faculty that did not complete the training between January 1, 2007, and February 28, 2008, and will be provided to all new hires effective immediately. A communication will be sent to those who missed the training with instructions on how to view the training online.
- b. We will develop written procedures to address emergency preparedness overview training for all newly hired staff and faculty, including the completion and retention of required training documentation.

Timeline: December 31, 2009

TESTING AND DRILLS

EVACUATION DRILLS FOR SPECIAL POPULATIONS

Recommendation 6

We recommend that the campus document the inclusion of special populations in evacuation exercises.

Campus Response

We concur. We will document the inclusion of special populations in the campus evacuation exercises.

Timeline: September 30, 2009

RECORDKEEPING FOR EMERGENCY BACKUP GENERATORS

Recommendation 7

We recommend that the campus ensure that emergency generator records be accurately maintained and kept current.

Campus Response

We concur. The campus will ensure that emergency generator records are accurately maintained and current.

Timeline: September 30, 2009

THE CALIFORNIA STATE UNIVERSITY
OFFICE OF THE CHANCELLOR

BAKERSFIELD

September 21, 2009

CHANNEL ISLANDS

CHICO

MEMORANDUM

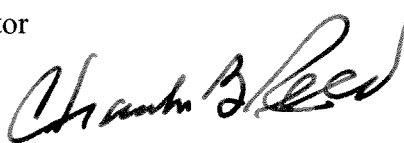
DOMINGUEZ HILLS

EAST BAY

TO: Mr. Larry Mandel
University Auditor

FRESNO

FROM: Charles B. Reed
Chancellor



FULLERTON

HUMBOLDT

SUBJECT: Draft Final Report 09-44 on *Emergency Preparedness*,
California State Polytechnic University, Pomona

LONG BEACH

LOS ANGELES

In response to your memorandum of September 21, 2009, I accept the response as submitted with the draft final report on *Emergency Preparedness*, California State Polytechnic University, Pomona.

MARITIME ACADEMY

MONTEREY BAY

NORTHRIDGE

CBR/amd

POMONA

SACRAMENTO

SAN BERNARDINO

SAN DIEGO

SAN FRANCISCO

SAN JOSÉ

SAN LUIS OBISPO

SAN MARCOS

SONOMA

STANISLAUS